

1 Karma M. Giulianelli (SBN 184175)
2 karma.giulianelli@bartlitbeck.com
3 **BARTLIT BECK LLP**
4 1801 Wewatta St., Suite 1200
5 Denver, Colorado 80202
6 Telephone: (303) 592-3100

7 Hae Sung Nam (*pro hac vice*)
8 hnam@kaplanfox.com
9 **KAPLAN FOX & KILSHEIMER LLP**
10 850 Third Avenue
11 New York, NY 10022
12 Telephone: (212) 687-1980

13 *Co-Lead Counsel for Consumer Plaintiffs*

14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE GOOGLE PLAY STORE ANTITRUST
LITIGATION

Case No. 3:21-md-02981-JD

THIS DOCUMENT RELATES TO:

*In re Google Play Consumer Antitrust
Litigation*, Case No. 3:20-cv-05761-JD

**DECLARATION OF KARMA M.
GIULIANELLI IN SUPPORT OF
STIPULATED [PROPOSED] ORDER
SHORTENING TIME TO BE HEARD FOR
MOTION TO AUTHORIZE NOTICE OF
PENDENCY TO THE CONSUMER
PLAINTIFF CLASS**

Judge: Hon. James Donato

1 I, Karma M. Giulianelli, declare as follows:

2 1. I am an attorney duly admitted to practice in the States of Colorado and California
3 and before this Court. I am a partner of the law firm of Bartlit Beck LLP and one of the two
4 appointed Co-Lead Class Counsel for the certified Class of Consumer Plaintiffs in this action. I
5 submit this declaration in support of the parties' Stipulated [Proposed] Order Shortening Time to
6 Be Heard For Motion To Authorize Notice of Pendency to the Consumer Plaintiff Class. The
7 contents of this declaration are based on my personal knowledge, including my personal knowledge
8 of the documents described herein. The facts set forth herein are within my personal knowledge
9 and if called as a witness, I could and would competently testify to them.

10 2. Consumer Plaintiffs seek an order shortening time on Consumer Plaintiffs' Motion
11 to Authorize Notice of Pendency to the Consumer Plaintiff Class (the "Motion"). Consumer
12 Plaintiffs seek a shortening of time from 35 to 28 days so that the matter may be heard on
13 September 7, 2023, the date when the Court has scheduled the hearing on several related motions
14 and other trial preparation matters.

15 3. Hearing the Motion on September 7 will enable the Court to consider the motion
16 alongside other related motions and issues, including the State Plaintiffs' previously filed Motion
17 for Approval of Notice of Pendency and Opportunity to Opt Out, ECF No. 546, which is set for
18 argument on September 7, 2023, as well as the other pretrial conference matters set for that date,
19 ECF No. 571.

20 4. Preparation of the Motion after the August 3 summary judgment hearing required
21 drafting the relevant papers and securing the services of A.B. Data, a notice administrator. On
22 August 9, 2023, Class Counsel reached out to counsel for Google to request Google's position on
23 shortening time to be heard on the Motion. Google counsel indicated that Google takes no position
24 on whether the Motion should be heard on September 7, 2023, but agreed to stipulate to the Motion
25 being heard on September 7, on the conditions that (1) the schedule did not shorten the time
26 normally available for Google to respond to the Motion, (2) Consumer Plaintiffs filed their motion
27 on August 10, and (3) Consumer Plaintiffs clearly stated that Google has not seen the Motion and
28 reserves the right to respond.

7 I declare under penalty of perjury under the laws of the United States of America that the
8 foregoing is true and correct.

By: /s/ Karma M. Giulianelli
Karma M. Giulianelli
Co-Lead Counsel for Consumer Plaintiffs

E-FILING ATTESTATION

I, Karma M. Giulianelli, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(h)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Karma M. Giulianelli

Karma M. Giulianelli